SUSMAN GODFREY L.L.P.
A REGISTERED LIMITED LIABILITY PARTNERSHIP
1301 AVENUE OF THE AMERICAS, 32ND FLOOR
NEW YORK, NEW YORK 10019-6022
WWW.SUSMANGODFREY.COM

HOUSTON | LOS ANGELES | SEATTLE

STEPHEN SHACKELFORD, JR.
SSHACKELFORD@SUSMANGODFREY.COM
DIRECT DIAL (212) 729-2012

April 14, 2017

VIA E-MAIL AND HAND DELIVERY
The Honorable Denise L. Cote
United States District Court
Southern District of New York
500 Pearl Street, Room 1610
New York, NY 10007

Re: *In re Application of the Coalition To Protect Clifton Bay and Louis Bacon for an Order Pursuant to 28 U.S.C. § 1782 to Conduct Discovery for Use in Foreign Proceedings,* Case No.: 14-MC-258

Dear Judge Cote:

We represent the Petitioner Louis Bacon ("Mr. Bacon") in connection with the above referenced action (the "Action").

We write pursuant to Rule 4(A) of Your Honor's Individual Practices in Civil Cases to request permission to submit a letter motion and exhibits under seal. This letter motion and exhibits, which we plan to submit today to Your Honor via e-mail and hand delivery, addresses, among other issues, the de-designation of ten documents Peter Nygård has marked "Confidential" pursuant to the Protective Order in this Action. Because these documents are designated as "Confidential," pursuant to the Protective Order in this Action we seek permission to file them, as well as the portion of the letter motion that speaks to the content of the documents, under seal.

Sincerely,

Stephen Shackelford, Jr.
Counsel for Louis Bacon

cc: Counsel for Nygård (via ECF)
Counsel for Feralio (via ECF)